

MEMORANDUM

SUBJECT: Yakima Pesticide Laboratory Remedial Action Goals Memo dated August 19, 1992

From: Lynda Priddy

TO: Pat Cirone

I have reviewed the memo from yourself to Carol Rushin regarding the action levels established for the Yakima Pesticide Lab remedial action pursuant to RCRA. I would like to clarify a few points.

1. As you mentioned in your memo, Azinophosmethyl, TEPP and parathion have a relatively short residual life and may not be present in the soil. I assume your statement also applies to Diazinon and sulfotepp. Action levels were not set for these compounds because these compounds were not observed at the detection limits for the sampling methods used at the site. Not detecting these compounds is consistent with their short residual life, generally less than a few months. The last time these substances were introduced into the site (septic tank/drainfield system) was 1985 (at the very latest). Remedial action was initiated at the site in 1990.
2. An action level was not set for benzene because it was not found in sampling at detection limits.
3. The last paragraph of your memo also noted concern that several action levels were above the background for that substance. You explained that contaminants that could be expected to be found at the site may have ecological effects as well as human health effects.

Groundwater and soil sampling results indicate that all samples of the substances noted in your memo were determined to be below quantitation limits for that substance using standard EPA methods. See Attachment I for the quantitation limits of the substances identified to be of concern. As we discussed and agreed these detection limits are 3 to 5 orders of magnitude below the action levels identified to be of possible ecological concern to you. In our discussion we agreed that contamination, if it existed, at worst would be in the low ppb range for the substances you noted. We agreed that this level of contamination would not pose a significant ecological concern given the fact that there are no critical habitats or endangered species identified at the site.

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Also as we discussed, while it is true that some of the action levels established are above background, the action levels were established based on RCRA Subpart S Corrective Action standards, which correspond to a risk of one in a million for carcinogenic effects in a residential scenario for human health concerns.

Thank you for your memo.

# QUANTITATION LIMITS

Azinophos-methyl	0.8 - 32.0 ppb
TEPP	5.0 - 200.0 ppb
ethyl parathion	0.2 - 8.0 ppb
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diazinon	0.1 - 8.0 ppb
benzene	5.0 ppb
lindane	0.02 - 2.0 ppb
Dursban (chlorpyrifos)	0.2 - 10 ppb
2, 4-D	0.10 ppb